REMARKS

Claims 27, 28, 31 – 32 and 34 are presently pending in the application. Applicants are submitting a supplemental Declaration herewith to correct the title of the originally filed Declaration. Reconsideration of the claim rejections is respectfully requested in view of the following argument.

Claim Rejections – 35 U.S.C. § 103(a)

Claims 27, 28, 31 – 32 and 34 stand finally rejected under section 103(a) as being unpatentable over Parsons U.S. Patent No. 6,871,214 ("Parsons") in view of Joyce U.S. Patent No. 5,546,455 ("Joyce"). Applicant respectfully traverses this rejection and submits that the combination of Parsons and Joyce fails to teach or suggest the claimed invention.

Claim 27, as amended, calls for a device for providing a salesperson with notification of consumer interactions with an employer of the salesperson, the device comprising:

> a memory medium containing executable program instructions which, when executed by a processor, provide:

> a system settings module, *the system settings module permitting the salesperson to define at least one target in a plurality of on-line communication channels between the salesperson and a customer associated with the salesperson;*

> a channel monitor, the channel monitor enabling the on-line communication channels between the salesperson and the customer, the channel monitor analyzing the content of communications on the on-line communication channels *for communications with the customer associated with the salesperson* and that include *content matching with communications containing the at least one target defined by the salesperson;* the channel monitor generating notifications to the salesperson for communications containing the at least one target; and

> a report generator, the report generator receiving a query from the salesperson and reporting a notification history relating to communications containing the at least one target defined by the salesperson and matching parameters of the query.

Parsons discloses a system for providing a user with an alert to a Wireless Access Protocol (WAP) enabled device indicating that messages left for the user in various formats (e.g., email, voicemail and the like) have been received. See Abstract and disclosure at Col. 2, lines 1 – 10. Parsons further discloses information sources for new information of interest to the user may be monitored (e.g., stock or product price quotes) and such information be provided as an alert notification. See Col. 2, lines 11 – 15.

The Examiner acknowledges that Parsons "does not specifically disclose a salesperson or customer" but concludes that "Parsons does disclose CRM" and "in that regard, it was old and well know[n, sic] that CRM applications include a salesperson and a customer." See Office Action at page 3. Applicant respectfully submits that this contention is without merit.

There is nothing in Parsons that teaches or suggests "a system settings module, *the system settings module permitting the salesperson to define at least one target in a plurality of on-line communication channels between the salesperson and a customer associated with the salesperson...*" Parsons merely mentions "a CRM event" among "messages left for a user..." See Col. 2, line 2. This statement does not suggest a system whereby a salesperson can define a target in a plurality of on-line communication channels between a salesperson and a customer associated with that salesperson.

Moreover, there is nothing in Parsons that teaches or suggests "...the channel monitor analyzing the content of communications on the on-line ´ communication channels *for communications with the customer associated with the salesperson* and that include *content matching with communications containing the at least one target defined by the salesperson...* " Parsons teaches:

> The information in store 204 can further include an indication of the user's status and/or whether or not the user is presently interested in receiving message notifications. Moreover, the information in store 204 can include filters for determining what types of messages the user is interested in receiving alerts about. These filters can be based on the type of message (e.g. notify about emails and voice mails, but don't notify about faxes), and/or the identity of the sender of the message, and/or the contents of the message (e.g. keywords in the subject line, or a

priority flag in the message). In this event, the notification server 202 can also include user interface functionality (e.g. an HTTP server for communicating with a user's browser via the LAN 108 or the Internet, programmed buttons on a desk phone for signaling to a client application in the LAN 108, etc.) for allowing the user to configure and/or change their message notification filters, preferences and/or notification status.

Parsons at Col. 5, lines 41 – 57.

Thus, Parsons teaches that filtering may be applied to individual messages based on keywords in a subject line or a priority flag in a particular message to allow the user to set which messages a user is interested in receiving alerts about. However, Parsons still fails to disclose or suggest customer/salesperson communications combined with targets set by the salesperson.

The Examiner cites Joyce for the teaching of "a device with a report generator, the report generator receiving a query from the salesperson and reporting a notification history relating to communications containing the at least one target defined by the salesperson and matching parameters of the query." See Office Action at page 4 (citing Abstract, col. 2, lines 43 – 47 and col. 3, lines 59 – 65).

Applicant respectfully submits that Joyce fails to remedy the deficiencies in the disclosure of Parsons and that the combination of Parsons and Joyce fails to reach the claimed invention.

Joyce teaches "…methods for accessing telephone-call-related information in an automatic call distribution (ACD) system wherein dynamic real-time information is queried in real time without having been stored previously in a static or mass storage data structure." See Col. 1, lines 34 – 38. The portions of Joyce cited by the Examiner merely teach that data shared in the host memory of a host server system can be provided to a requesting client system. This has nothing to do with the present invention as described above.

Joyce does not contain any teaching or suggestion of "…a report generator, the report generator receiving a query from the salesperson and *reporting a notification history relating to communications containing the at least one target defined by the salesperson and matching parameters of the query.*"

Moreover, Applicant submits that Joyce is non-analogous art. "To rely on a reference as a basis for rejection of an applicant's invention, the reference must either (1) be in the field of applicant's endeavor or, (2) if not, then must be reasonably pertinent to the particular problem with which the inventor was concerned." M.P.E.P. § 2141.01(a) (citing In re Oetiker, 977 F.2d 1443, 1446 (Fed. Cir. 1992)). To determine whether a reference is in the same field of endeavor as applicant's invention, similarities in structure and function of the inventions carry great weight. M.P.E.P. § 2141.01(a).

Joyce is specifically directed to automatic call distribution systems where a query for a user-specified subset of live data in shared host memory can be reported in real time. This reference is thus not in Applicant's field of endeavor; salesperson/customer notifications via a plurality of communication channels. Neither is Joyce reasonably pertinent to the particular problem to which the present invention is directed for the same reasons. The fact that Joyce discloses querying a host in real time for so called "live data" has nothing to do with the claimed system.

In view of the foregoing, Applicants respectfully submit that the combination of Parsons and Joyce fails to reach the claimed invention and that claims 27, 28, 31 – 32 and 34 are patentable over the cited art.

The Office is hereby authorized to charge any additional fees or credit any overpayments under 37 C.F.R. 1.16 or 1.17 to AT&T Corp. Account No. 01-2745. The Examiner is invited to contact the undersigned at (908) 707-1573 to discuss any matter concerning this application.

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